

# ARNOLD & PORTER KAYE SCHOLER

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SUPERFUND DIV.  
DIRECTOR'S OFFICE

February 1, 2017

**VIA U.S. MAIL AND E-MAIL**

Mr. Kenneth Talton  
Enforcement Officer  
Superfund Enforcement Assessment Section  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

Re: CERCLA 104(e) Request for Information at the SBA Shipyard Superfund  
Site, Jennings, Jefferson Davis Parish, Louisiana

Dear Mr. Talton.

I write on behalf of Honeywell International Inc. ("Honeywell") in response to the U.S. Environmental Protection Agency's ("EPA's") January 11, 2017 request for information pursuant to Section 104(e) of CERCLA ("the 104(e) Request"). The 104(e) Request seeks information concerning business transactions between Honeywell and the owners and operators of the SBA Shipyard Superfund Site ("SBA Shipyard") in Jennings, Jefferson Davis Parish, Louisiana. The SBA Shipyard operated between 1965 and 1999, primarily for construction, repair, and cleaning of barges.

In the telephone discussion that you had with my colleague Laura Cottingham on January 25, 2017, as well as Ms. Cottingham's discussion with Ms. I-Jung Chiang on January 24, 2017, we requested any information that EPA has on Honeywell's nexus to the SBA Shipyard in order to assist our search for relevant records. We understand that EPA does not have documentation of Honeywell or any of its corporate affiliates transacting business with the SBA Shipyard at any point in time but that EPA sent the 104(e) Request to Honeywell because an unnamed entity, in responding to a previously issued 104(e) Request, identified AlliedSignal (which acquired Honeywell in 1999) as an entity that may have had dealings with the shipyard. That responding entity supplied a list



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of approximately 50 names of corporate entities that it believed might have utilized the SBA Shipyard at some point, but did not provide any additional information (i.e. dates of dealings, type or source of waste).

Honeywell has searched its records -- which encompass records for AlliedSignal -- for documents containing information responsive to the 104(e) Request. Honeywell stores its hard copy records in facilities maintained by Iron Mountain Incorporated. Those records are stored in file folders and those file folders are indexed by category. Honeywell ran digital searches of the indexed categories using the following terms, none of which yielded any results:

Bunge Street  
Jennings and Louisiana  
Jennings and LA  
Jennings and Jefferson  
Jefferson Davis Parish  
Leevac  
Mermentau  
SBA Shipyard  
Shipyard Superfund  
Smailhall  
Smailhall

Honeywell also searched its records using the term "Castex," which identified one box of records. However, the files therein are related to purchase orders for casting products, not the address of the SBA Shipyard (9040 Castex Landing Rd.). Thus, those files are not relevant to the 104(e) Request. Further, Honeywell is not aware of any facility that used SBA Shipyard in any time period.

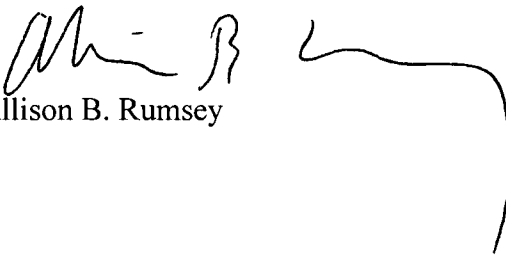
After conducting a thorough, good faith search of its records, Honeywell has been unable to identify documents indicating that it or any of its corporate affiliates transacted business with the SBA Shipyard. Please note that, in providing this letter, Honeywell does not waive and specifically reserves any and all objections and privileges it may have as to the 104(e) Request.

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Please feel free to contact me if you need additional information or have questions about Honeywell's record-searching procedures.

Sincerely,



Allison B. Rumsey

cc: Tom Byrne, Honeywell International Inc.  
Tao Wu, Honeywell International Inc.  
I-Jung Chiang, EPA

**ARNOLD & PORTER  
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